

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF DAVID JACOBY ON BEHALF OF THE SONY MUSIC
PLAINTIFFS IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, David Jacoby, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as Senior Vice President, Business and Legal Affairs, Sony Music Entertainment. I have held that position or a similar position since 2015. I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at Sony Music Entertainment. If called upon and sworn as a witness, I could and would testify competently as to the matters set forth herein.

2. I submit this declaration on behalf of Plaintiffs Sony Music Entertainment, Arista Music, Arista Records LLC, LaFace Records LLC, Provident Label Group, LLC, Sony Music Entertainment US Latin, Volcano Entertainment III, LLC, and Zomba Recordings LLC (hereinafter, collectively, "Sony Music"). Sony Music and its record labels produce, market, sell, license and otherwise exploit sound recordings and audiovisual works, generally featuring prerecorded music.

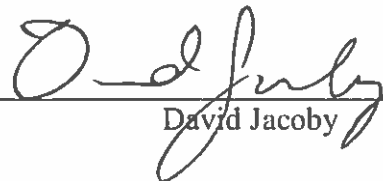
3. I understand that this declaration is to be submitted to the Court in connection with a motion to compel filed by Defendants Cox Communications, Inc. and CoxCom, LLC

(collectively, “Defendants” or “Cox”). I also understand that Cox seeks documents and information relating to notices Sony Music has received pursuant to Sections 203 or 304 of the Copyright Act (17 U.S.C. §§ 203, 304) that purport to terminate alleged “grants” of United States copyright rights in certain sound recordings to Sony Music or its predecessors in interest (“Termination Notices”).

4. [REDACTED]

5. [REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



David Jacoby

Executed this 8th day of July, 2019 in New York, New York.